

TR010034 – A57 Link Roads

SoS Consultation Letter, dated 1st November 2022

Comments on Applicant's response to CPRE of 31st October

Daniel Wimberley, Tuesday 08 November 2022

Unique Reference at the EiP: 20029775

ABBREVIATIONS

Abbreviations which may be used in this document are as follows:

AQ	Air Quality
BBA	Balfour Beatty Atkins
BCR	Benefit Cost Ratio
CAP	Clean Air Plan
CAZ	Clean Air Zone
CC2020	Community Consultation for the A57 Link Roads scheme run by H.E. from 5 November to 17 December 2020
CCC	Climate Change Committee
DCC	Derbyshire County Council
DfT	Department for Transport
DTP	Decarbonisation Transport Plan
EiP	Examination in Public
ES	Environmental Statement
AV	Electric vehicle
ExA	Examining Authority
GGGV	Godley Green Garden Village
HPBC	High Peak Borough Council
HE/NH	Highways England / National Highways
IP	Interested Party
ISH	Issue Specific Hearings
LIR	Local Impact Report
NPS-NN	National Policy Statement - National Networks
PINS	Planning Inspectorate
REC SoS	Recommendation to the SoS and her team
SOCC	Statement of Community Consultation
SoS	Secretary of State
SRN	Strategic Road Network
TAR	Transport Assessment Report
TfGM	Transport for Greater Manchester
TPU	Transpennine upgrade
VfM	Value for Money

Introductory remarks

1. The gist of NH's reply to CPRE's points is that the A57 plan came first and it was already known about when Godley Green Garden Village came to be seriously considered and planned. Therefore, says NH, Godley Green Garden Village has to take account of the A57 link roads scheme and not vice versa.
2. This line of argument is very convenient for NH but it does not pass the sniff test. If the impact of this development is so large as to require "mitigation to be identified and secured" (as indeed it is) then what happens if the only sensible mitigation is to alter the A57 link roads design in some way, and if alternative solutions to mitigation are far more costly?
3. This seems like - well "odd" is one way of putting it; "madness" is another.
4. It really is not much of a get-out clause to say that "only 340 of the 2150 dwellings were to be built out by 2025." (*CPRE opening comment, NH reply para. 2*)
5. If the only sensible mitigation for potential problems relating to transport at GGGV is wholeheartedly to align the entire development with government transport policy as contained in the DTP, the Better Buses document, Gear Change, the IRP, and Levelling Up White Paper - see my EiP submission referred to in my response to the previous SoS consultation - then the question arises, why not apply the same logic to Glossop Dale?
6. Indeed. A wholehearted sustainable transport option would serve the people of Glossop Dale, the residents of GGGV, those living alongside roads going into the centre of Manchester and in Manchester generally, our future on this planet, and what is more be in line with government policy on urban traffic!

Section 7a)

7. Paragraph three of NH's reply shows that they believe that providing for additional traffic is the same as mitigating its effects. It isn't. Wherever that traffic goes it causes all the traffic nuisances which we all know about (with the sole exception of tailpipe emissions and these will only come to an end when all vehicles are EVs, and the timetable even for that becoming widely the case is receding as the cost of living crisis affects car purchases.
8. The real way to mitigate the impacts is first to ensure that the residents of GGGV have local facilities providing for as many of their needs as possible (a 15-minute neighbourhood) thereby enabling most journeys to be on foot or wheeling, and that the journeys to work or for "city centre purposes" (broadly defined) can be done via a comprehensive public transport network. That is true mitigation, *reducing* the impact, not *catering for* impacts

Section 7b)

9. I would just bring to your attention the first quoted passage in italics in the response of NH, note especially the second sentence:
10. *"Since our last response, additional contact has been made with the developer's transport consultants with the aim of ensuring that the evidence presented gives NH the confidence that there would not be a severe impact to the SRN, should this development (i.e. GGGV) be granted planning permission. At present we are unable to make that determination, and as*

such we request that this application remains on hold until the developer is able to provide sufficient evidence as to the impact of the proposals”.

11. This supports what I have said above at paragraphs 1 and 2 above. I recommend **(Rec Sos)** that you ask yourselves whether the cart is not before the horse in some way here?

Section 7c)

12. See paragraphs 3 and 4 in the response of NH. **Rec SoS** Please take on board that the Highways England Future Works Programme needs to be satisfactorily completed, appraised and reviewed, and then form part of your consideration of this scheme. To decide on this scheme without such knowledge would be unwise - in fact it represents a considerable risk, with consequences downstream which you cannot, at present, assess because the “Highways England Future Works Programme” document is not complete, and you are therefore without key evidence. .
13. It seems that HE/NH would like to put the A57 link roads into a little box all on its own. But it isn't in a little box, it can't be, it feeds into and influences the major roads throughout Manchester, especially as we now know that it will generate more commuters and more other traffic into and out of Manchester to and from Glossop Dale. (*see my response to the previous SoS consultation*), a fact which HE/NH were at pains to conceal all along the way.